

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

John Joseph Piquette aka John J. Piquette aka John :
J. Piquette, Sr. aka John Null Piquette and :
Christine Ann Piquette aka Christine A. Piquette :
aka Christine Piquette :
aka Christine Ann Hurley aka Christine Hurley aka :

Debtor(s)

John Joseph Piquette aka John J. Piquette aka John :
J. Piquette, Sr. aka John Null Piquette and :
Christine Ann Piquette aka Christine A. Piquette :
aka Christine Piquette :
aka Christine Ann Hurley aka Christine Hurley aka :

Plaintiff(s)/Movant(s)

vs.

THE BANK OF NEW YORK MELLON, FKA :
THE BANK OF NEW YORK, AS TRUSTEE :
(CWALT 2004-22CB) :

Defendant(s)/Respondent(s)

CHAPTER 13

CASE NO. 5 - 12 -bk- 02789

ADVERSARY NO. __-__ ap-__
(if applicable)

Nature of Proceeding: Debtors' Motion
to Determine Final Cure

Document #: 95

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

The parties are reviewing their respective records in an attempt to determine whether or not funds intended to be applied to the Debtors' post-petition account were or were not applied to the account.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: July 7, 2017

/s/ Harry B. Reese

Attorney for Respondent Bank of New York Mello

Name: Harry B. Reese, Esquire

Phone Number: 215-942-2090

¹ No alterations or interlineations of this document are permitted.

² If this is not a first request for a continuance, then a Motion to Continue must be filed.